



National Cable & Telecommunications Association

1724 Massachusetts Avenue, NW
Washington, DC 20036
(202) 775-3550

www.ncta.com

Neal M. Goldberg
General Counsel

(202) 775-3664
(202) 775-3603 Fax

February 6, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: CS Docket No. 97-80 (Commercial Availability of Navigation Devices)

Dear Ms. Dortch:

The Second Report and Order in this docket directs the cable industry to report by December 1, 2005 on the feasibility of deploying downloadable security; whether such deployment is preferable to the existing separate security system (i.e., CableCARDs); and whether the cable industry will commit to its deployment in its own devices and those purchased at retail. The Commission also asked for the submission of a proposed timetable for the deployment of downloadable security and for a draft copy of the licensing terms to which manufacturers would have to agree to include the downloadable security solution in their devices. The National Cable & Telecommunications Association ("NCTA") submitted that report on behalf of the industry on November 30, 2005.

In that filing, we reported that downloadable security is a feasible conditional access approach, that it is preferable to the existing separate security configuration, and that the cable industry will commit to its implementation for its own devices and those purchased at retail. We expect a national rollout of a downloadable security system by July 1, 2008. A copy of the licensing terms to include downloadable security in commercial retail devices was attached.

A number of parties filed comments in response to the NCTA DCAS Report. Attached for filing with the Commission are NCTA's Reply Comments addressing those filings.

Ms. Marlene H. Dortch

February 6, 2006

Page 2

If you have any questions, please contact me.

Sincerely,

/s/ Neal M. Goldberg

Neal M. Goldberg

Attachment

cc: Donna Gregg
Bill Johnson
Deborah Klein
Natalie Roisman
Mary Beth Murphy
John Wong
Alison Greenwald
Tom Horan
Steve Broeckaert
Michael Lance
John Gabrysch
Sarah Mahmood
Jeff Neuman
Alan Stillwell
Priscilla Lee
Heather Dixon
Rudy Brioche
Jordan Goldstein
Andrew Long